

CORRECTED EXHIBIT 1
TO
DECLARATION OF
DAVID M. YOUNG, ESQ.,
In Support
Of Plaintiff *ePlus* inc.'s Claim
Construction Brief
filed January 6, 2010 (Docket No. 143)

CORRECTED EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
Electronic sourcing system (‘683 Patent: claims 3, 6; ‘516 Patent: claims 1, 2, 6, 9, 21, 22, 29; ‘172 Patent: claim 1)	An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors.	A system for determining what inventory will be used to fulfill requests for items.
Catalog/Product Catalog (‘683 Patent: claims 3, 26, 28, 29; ‘516 Patent: claims 1, 2, 6, 9, 21, 22, 29)	This claim term does not require construction beyond its plain and ordinary meaning. To the extent, however, that the Court believes such term requires construction, ePlus proposes the following construction: an organized collection of items and associated information which typically includes a part number, price, catalog number, vendor name, vendor ID, a textual description of an item, and images of or relating to the item.	A collection of text and images organized and published by a vendor, representing products sold by that vendor.
Converting data related to a selected matching item and an associated source to an item and a different source (‘683 Patent: claim 28)	This term requires no construction beyond its plain and ordinary meaning. To the extent, however, that the Court believes that such term requires construction, ePlus proposes the following construction: A process of cross-referencing data relating to a selected matching item and an associated source to an item an a different source.	Substituting a catalog entry related to a product with a catalog entry describing the product from a different source by using matching codes in a cross-reference table for sourcing and pricing.
Subset (‘516 Patent: claims 1, 29)	This term requires no construction beyond its plain and ordinary meaning	Less than all of a set selectable items.
Matching Items	This term requires no construction beyond its plain and ordinary	The results of a search of items matching a user-entered search

EXHIBIT 1
Comparison of Parties' Proposed Constructions

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(‘683 Patent: claims 3, 6, 26, 28, 29; ‘172 Patent: claim 1)	meaning. To the extent, however, that the Court believes such term requires construction, ePlus proposes the following construction: Items returned in search results that satisfy search criteria.	criteria (<i>i.e.</i> , “Hit List”).
Selected Matching Items (‘683 Patent: claims 3, 6, 26, 28, 29; ‘172 Patent: claim 1)	This term requires no construction beyond its plain and ordinary meaning. To the extent, however, that the Court believes such term requires construction, ePlus proposes the following construction: Items returned in search results that satisfy search criteria and are selected for inclusion on an order list or in a requisition.	One or more items selected by a user in the search program from the list of “matching items” for inclusion in an order list.
Searching for matching items among the [selected product catalogs/data relating to the items] (‘683 Patent: claims 26, 28)	This term requires no construction beyond its plain and ordinary meaning	Searching selected product catalogs to locate items in response to user-entered search criteria.
Order List (‘172 Patent: claim 1)	This term requires no construction beyond its plain and ordinary meaning.	A list of items derived from a list of selected matching items.
Protocol (‘516 Patent: claims 1, 29)	This term requires no construction beyond its plain and ordinary meaning	A procedure.
Cross-Reference Table (‘516 Patent: claims 21, 29)	This term requires no construction beyond its plain and ordinary meaning.	A table including reference or identification codes used to link vendor items by catalog number between two or more different vendors determined by a Distributor to be equivalent.
A multiple purchase order generation module, said	This claim element requires no construction beyond its plain and ordinary meaning.	Function: creating multiple purchase orders from a single requisition created with said user-

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	<i>ePlus's</i> Proposed Construction	Lawson's Proposed Construction
<p>purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria (‘516 Patent: claim 21)</p>		<p>generated criteria and said search-module criteria.</p> <p>Corresponding Structure: None.</p>
<p>Means for selecting the product catalogs to search (‘683 Patent: claim 3)</p>	<p>Function: selecting the product catalogs to search.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules to execute an algorithm which includes the steps of: (1) receiving inputted information relating to a user's selection of product catalogs to search from among the at least two product catalogs available; and (2) communicating the input selection to a search engine module; or (1) selecting catalogs to be searched from among the at least two product catalogs available based on preferences or history; and (2) communicating the catalog selection to a search engine program; and structural equivalents thereof.</p> <p><i>See, e.g., '683 Patent, Col. 5, l. 66 to Col. 6, l. 3; Col. 6, ll. 11-13; Col. 7, ll. 38-43; Col. 7, l. 61 to Col. 8, l. 2; Col. 8, ll. 8-26; Col. 8, ll. 33-58; Col. 9, ll. 19-34; Col. 9:52-Col. 10:20; Col. 16, ll. 40-54; Col. 17, ll. 14-15; Col. 17, ll. 34-38; Col. 17, ll. 56-61; Col. 18, ll.</i></p>	<p>Function: selecting two or more product catalogs to search</p> <p>Corresponding Structure: Two means for selecting two or more product catalogs are disclosed:</p> <ol style="list-style-type: none"> 1. Software initiated from catalog search program (50 or 250) running on local computer (20 or 220) that consists of the following steps: <ol style="list-style-type: none"> a. selecting two or more product catalogs from a list of available catalogs displayed to a user (‘683 col. 9:52-67); and 2. Software initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following steps: <ol style="list-style-type: none"> a. entering vendor identification information into requisition/purchasing system (10:8-11); and b. communicating vendor identification from requisition/purchasing system to catalog search program running on same local computer via the DDE protocol of interface (60) (10:8-20)

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
	32-39; Col. 18, ll. 42-47; Col. 18, ll. 52-67; Appendix VII; Figs. 1A, 1B, 1C, 2.	
Means for searching for matching items among the selected product catalogs (‘683 Patent: claim 3)	<p>Function: searching for matching items among the selected product catalogs.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a search engine module to execute an algorithm which includes the steps of: (1) receiving search criteria (<i>e.g.</i>, catalog number, part number, partial textual description) relating to item(s) to be searched; (2) communicating the search criteria to a search engine module; (3) querying certain fields of the item data to locate item records in the selected product catalogs matching the search criteria; and (4) outputting items matching the search criteria; and structural equivalents thereof.</p> <p><i>See, e.g.</i>, ‘683 Patent, Col. 4, ll. 4-9; Col. 4, ll. 25-30; Col. 5, ll. 18-39; Col. 5, l. 61-Col. 6, l. 22; Col. 7, l. 61-Col. 8, l. 32; Col. 8, l. 40-Col. 10, l. 20; Col. 10, l. 65-Col. 11, l. 29; Col. 12, ll. 4-29; Col. 16, ll. 8-32; Col. 18, ll. 6-13; Figs. 1A, 1B, 1C, 2; Appendices I, II, III, IV, V, VI, VIII.</p>	<p>Function: searching for matching items among the selected two or more product catalogs</p> <p>Corresponding Structure: Two means are disclosed:</p> <ol style="list-style-type: none"> 1. Software initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following steps: <ol style="list-style-type: none"> a. entering certain search criteria (<i>e.g.</i>, catalog number, part number, or partial text) relating to item(s) to be searched into requisition/purchasing system (7:48-55; 7:61-8:2; 8:22-26); b. searching local RIMS databases (42) based on search criteria, and if found, search is complete (6:6-8; 7:36-38; 4:20-23); c. if items are not found in RIMS databases (42), communicating the search criteria from requisition/purchasing system (40 or 240) to catalog search program (50 or 250) running on same local computer via the DDE protocol of interface (60) (8:37-9:8); d. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4). e. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) based on the search criteria

EXHIBIT 1
Comparison of Parties' Proposed Constructions

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		<p>received from requisition/purchasing system (9:34-37; 10:8-20);</p> <p>f. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword and (c) page number, stopping at highest priority search criteria resulting in a match (6:14-22); and</p> <p>g. displaying via catalog search program a hit list of search results (9:39-45).</p> <p>2. Software initiated from shell program (52 or 252) running on local computer (20 or 220), that consists of the following steps:</p> <p>a. displaying a search screen on the monitor of local computer (12:4-12; Appendix VII);</p> <p>b. receiving search criteria (<i>e.g.</i> catalog page number, keyword, part number) for item to be searched (9:12-14; 12:12-24);</p> <p>c. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only the selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4).</p> <p>d. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) running on local computer based on data received from shell program (52) (9:34-37; 10:8-20);</p> <p>e. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword, and (c) page number, stopping at highest priority search criteria resulting in a</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	<i>ePlus's</i> Proposed Construction	Lawson's Proposed Construction
		<p>match (6:14-22); and</p> <p>f. displaying via catalog search program a hit list (47) of search results (9:39-45; 10:2-4; 12:27-29, Appendix III)</p>
<p>Means for building a requisition using data relating to selected matching items and their associated source(s)</p> <p>(‘683 Patent: claims 3, 6)</p>	<p>Function: building a requisition using data relating to selected matching items and their associated source(s).</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a requisition module to execute an algorithm which includes the steps of: (1) selecting one or more items from hit lists of catalog items matching search criteria that were returned from searching selected product catalogs; (2) transferring the selected matching item data to a requisition module; and (3) building a requisition using data from the selected matching items to populate certain fields on the requisition form; and structural equivalents thereof.</p> <p><i>See, e.g.,</i> ‘683 Patent, Col. 1, ll. 11-35; Col. 3, ll. 16-19; Col. 4, ll. 1-3; Col. 4, ll. 10-22; Col. 5, ll. 18-38; Col. 6, l. 39-Col. 8, l. 2; Col. 10, ll. 21-43; Col. 11, ll. 30-67; Col. 12, l. 30-Col. 14, l. 4; Col. 16, ll. 40-54; Col. 17, ll. 10-28; Col. 18, ll. 47-52; Figs. 1-3; App. I, II, VI, VIII, IX.</p>	<p>Function: building a requisition using data relating to selected matching items and their associated source(s)</p> <p>Corresponding Structure: A software means initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following steps:</p> <p>a. entering certain data (<i>e.g.</i>, account number, requisition number) in requisition/purchasing system (40 or 240) to create requisition tables stored in requisition database (42A) 6:44-65; 7:20-28);</p> <p>b. initiating a search for matching item(s) in catalog database (36 or 236) from either requisition/purchasing system (40 or 240) or catalog search program (50 or 250) running on local computer (20 or 220) via two search means described above (8:15-32);</p> <p>c. displaying via catalog search program a hit list (47) of search results (9:39-45; 12:27-29; Appendix III);</p> <p>d. selecting one or more items to be requisitioned (20:21-24; 11:30-38);</p> <p>e. generating an order list (48) in shell (52 or 252) and catalog search program (50 or 250) containing data relating to selected items (<i>e.g.</i> vendor name, product description, list price) (11:20-38; 11:62-66);</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

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		<p>f. displaying data relating to selected items in order lists (48) (11:38-43; 12:38-40; Appendix VI);</p> <p>g. transmitting data from order list (48) to requisition/purchasing system running on same local computer (20) or 220) via the DDE protocol of interface (60) (11:50-54; 12:48-53; 13:1-21); and</p> <p>h. updating requisition tables in requisition database (42A) with data received from order list (48) via interface (60) (12:60-67).</p>
<p>Means for processing the requisition to generate one or more purchase orders for the selected matching items</p> <p>(‘683 Patent: claims 3, 6)</p>	<p>Function: processing the requisition to generate one or more purchase orders for the selected matching items.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a purchasing module to execute an algorithm which includes the steps of: (1) accepting the requisition; and (2) generating one or more purchase orders based on the data included in the requisition relating to the matching items selected from the items returned from searching selected product catalogs and based on predetermined rules relating to the user's preference (<i>e.g.</i>, one purchase order to each distinct supplier referenced in the requisition); and structural equivalents thereof.</p> <p><i>See, e.g., '683 Patent, Col. 1, ll. 10-35; Col. 10, ll. 52-64; Col. 15, ll. 20-54; Col. 17, ll. 44-48; Col. 18, ll. 18-29; Figs. 1-3.</i></p>	<p>Function: processing the requisition to generate one or more purchase orders for the selected matching items</p> <p>Corresponding Structure: None.</p>
Means for converting	Function: converting data relating	Function: converting data relating to

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
data relating to a selected matching item and an associated source to data relating to an item and a different source (‘683 Patent: claims 3, 6)	<p>to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules to execute an algorithm which includes the steps of: (1) maintaining a cross-reference table or file identifying cross-referenced items, identical items or generally equivalent items and one or more codes corresponding to cross-referenced items, identical items or generally equivalent items; (2) for a selected matching item, accessing the cross-reference table or file to identify an identical item or generally equivalent item cross-referenced to the selected matching item and associated with a different source; and (3) replacing the selected matching item and its associated source with the identical item or generally equivalent item and its different source in a requisition; and structural equivalents thereof.</p> <p><i>See, e.g., ‘683 Patent, Col. 4, l. 60 - Col. 5, l. 8; Col. 10, ll. 43-52; Col. 14, ll. 35-45; Col. 16, ll. 8-32; Col. 16, ll. 54-62; Col. 17, ll. 29-48; Appendices VII-X.</i></p>	<p>a selected matching item and an associated source to data relating to an item and a different source</p> <p>Corresponding Structure: None.</p>
Means for searching for matching items in the database (‘683 Patent: claim 6)	<p>Function: searching for matching items in the database.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a search engine module to execute an algorithm which includes the steps of: (1)</p>	<p>Function: searching for matching items in the database</p> <p>Corresponding Structure: Two means are disclosed:</p> <p>1. Software initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	<i>ePlus's Proposed Construction</i>	Lawson's Proposed Construction
	<p>receiving search criteria (<i>e.g.</i>, catalog number, part number, partial textual description) relating to item(s) to be searched; (2) communicating the search criteria to a search engine program; (3) querying certain fields of the item data to locate item records in the database matching the search criteria; and (4) outputting items matching the search criteria; and structural equivalents thereof.</p> <p><i>See, e.g.</i>, '683 Patent, Col. 4, ll. 4-9; Col. 4, ll. 25-30; Col. 5; ll. 18-39; Col. 5, 61-Col. 6, l. 22; Col. 7, l. 61-Col. 8, l. 32; Col. 8, l. 40-Col. 10, l. 20; Col. 10, l. 65- Col. 11, l. 29; Col. 12, ll. 4-29; Col. 16, ll. 8-32; Col. 18, ll. 6-13; Figs. 1A, 1B, 1C, 2; Appendices I, II, III, IV, V, VI, VII.</p>	<p>steps:</p> <p>a. entering certain search criteria (<i>e.g.</i>, catalog number, part number, or partial text) relating to item(s) to be searched into requisition/purchasing system (7:48-55; 7:61-8:2; 8:22-26);</p> <p>b. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4).</p> <p>c. searching local RIMS databases (42) based on search criteria, and if found, search is complete (6:6-8; 7:36; 4:20-23);</p> <p>d. if items are not found in RIMS databases (42), communicating the search criteria from requisition/purchasing system (40 or 240) to catalog search program (50 or 250) running on same local computer via the DDE protocol of interface (60) (8:37-9:8);</p> <p>e. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) based on the search criteria received from requisition/purchasing system (9:34-37; 10:8-20);</p> <p>f. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword and (c) page number, stopping at highest priority search criteria resulting in a match (6:14-22); and</p> <p>g. displaying via catalog search program a hit list of search results (9:39-45).</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

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		<p>2. Software initiated from shell program (52 or 252) running on local computer (20 or 220), that consists of the following steps:</p> <p>a. displaying a search screen on the monitor of local computer (12:4-12; Appendix VII);</p> <p>b. receiving search criteria (<i>e.g.</i>, catalog page number, keyword, part number) for item to be searched (9:12-14; 12:12-24);</p> <p>c. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only the selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4).</p> <p>d. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) running on local computer based on data received from shell program (52) (9:34-37; 10:8-20);</p> <p>e. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword, and (c) page number, stopping at highest priority search criteria resulting in a match (6:14-22); and</p> <p>f. displaying via catalog search program a hit list (47) of search results (9:39-45; 10:2-4; 12:27-29, Appendix III).</p>
<p>Means for entering product information that at least partially describes at least one desired item (‘172 Patent: claim 1)</p>	<p>Function: entering product information that at least partially describes at least one desired item.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software</p>	<p>Function: entering product information that at least partially describes at least one desired item</p> <p>Corresponding Structure: Two means are disclosed:</p> <p>1. A software means initiated from requisition/purchasing system (40 or</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

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	<p>modules to execute an algorithm which includes the step of receiving certain fields of entered information, (<i>e.g.</i>, catalog number, part number, partial text, etc.) to at least partially describe at least one desired item; and structural equivalents thereof.</p> <p><i>See, e.g.</i>, '172 Patent, Col. 5, l. 24- Col. 6, l. 27; Col. 7, l. 66- Col. 8, l. 37; Col. 8, ll. 45-62; Col. 12, ll. 6-28; Figs. 1-2; App. VII.</p>	<p>240) running on local computer (20 or 220) that consists of the following step:</p> <p>a. entering in requisition/purchasing system (40 or 240) certain fields of information (<i>e.g.</i>, catalog number, part number, or partial text) that partially describe an item ('683 Cols. 7:48-55, 7:61-8:2; 8:22-26)</p> <p>2. A software means initiated from shell program (52 or 252) running on local computer (20 or 220) that consists of the following steps:</p> <p>a. displaying a search screen on the monitor of local computer (12:4-12; Appendix VII); and</p> <p>b. entering search criteria (<i>e.g.</i>, catalog page number, keyword, part number) for item to be searched (1:12-14; 12:12-24).</p>
<p>Means for searching for matching items that match the entered product information in the selected portions of the database (‘172 Patent: claim 1)</p>	<p>Function: searching for matching items that match the entered product information in the selected portions of the database.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a search engine module to execute an algorithm which includes the steps of: (1) receiving the entered product information relating to item(s) to be searched; (2) communicating the entered product information to a search engine module; (3) querying certain fields of the item data to locate item records in the selected portions of the database matching the entered product information; and (4) outputting a hit list of items matching the</p>	<p>Function: searching for matching items that match the entered product information in the selected portions of the database</p> <p>Corresponding Structure: Two means are disclosed:</p> <p>1. Software initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following steps:</p> <p>a. entering certain search criteria (<i>e.g.</i>, catalog number, part number, or partial text) relating to item(s) to be searched into requisition/purchasing system (7:48-55; 7:61-8:2; 8:22-26);</p> <p>b. searching local RIMS databases (42) based on search criteria, and if found, search is complete (6:6-8; 7:36-38; 4:20-23);</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	<i>ePlus's Proposed Construction</i>	Lawson's Proposed Construction
	<p>entered product information; and structural equivalents thereof.</p> <p><i>See, e.g., '172 Patent, Col. 4, ll. 10-14; Col. 6, ll. 4-27; Col. 7, l. 66- Col. 8, l. 37; Col. 8, l. 45-Col. 10, l. 21; Col. 12, ll. 6-41; Figs. 1A, 1B, 1C, 2; Appendix III; Appendix VII.</i></p>	<p>c. if items are not found in RIMS databases (42), communicating the search criteria from requisition/purchasing system (40 or 240) to catalog search program (50 or 250) running on same local computer via the DDE protocol of interface (60) 8:37-9:8);</p> <p>d. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4).</p> <p>e. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) based on the search criteria received from requisition/purchasing system (9:34-37: 10:8-20);</p> <p>f. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword and (c) page number, stopping at highest priority search criteria insulting in a match (6:14-22); and</p> <p>g. displaying via catalog search program a hit list of search results (9:39-45)</p> <p>2. Software initiated from shell program (52 or 252) running on local computer (20 or 220), that consists of the following steps:</p> <p>a. displaying a search screen on the monitor of local computer (12:4-12); Appendix VII);</p> <p>b. receiving search criteria (<i>e.g.</i>, catalog page number, keyword, part number) for item to be searched (9:12-14; 12:12-24);</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
		<p>c. concatenating (<i>i.e.</i>, joining together by linking so as to form a chain or series) only the selected product catalogs to be searched after the user selects the catalogs to be searched (9:67-10:4).</p> <p>d. searching the concatenated catalogs from catalog database (36 or 236) via catalog search program (50 or 250) running on local computer based on data received from shell program (52) (9:34-37; 10:8-20);</p> <p>e. if more than one search criterion is received, catalog search program prioritizes search as follows: (a) part (catalog) number, (b) keyword, and (c) page number, stopping at highest priority search criteria resulting in a match (6:14-22); and</p> <p>f. displaying via catalog search program at hit list (47) of search results (9:39-45; 10:2-4; 12:27-29, Appendix III).</p>
<p>Means for generating an order list that includes at least one matching item selected by said means for searching (‘172 Patent: claim 1)</p>	<p>Function: generating an order list that includes at least one matching item selected by a search engine program.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules to execute an algorithm which includes the steps of: (1) displaying a hit list of results of a search corresponding to items matching the entered product information; (2) selecting one or more items from the hit list for inclusion in an order list; and (3) generating an order list containing data related to the selected matching items; and structural</p>	<p>Function: generating an order list that includes at least one matching item selected by said means for searching</p> <p>Corresponding Structure: A software means that utilizes catalog search program (50 or 250) and shell program (52 or 252) and consists of the following steps:</p> <p>a. displaying via catalog search program (50 or 250) a hit list (47) of search results (9:39-45; 12:27-29; Appendix III);</p> <p>b. selecting one or more items to be requisitioned (10:21-24, 11:30-38) and</p> <p>c. generating an order list (48) in shell (52 or 252) containing data</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
	<p>equivalents thereof.</p> <p><i>See, e.g., '172 Patent, Col. 9, l. 51-Col. 10, l. 44; Col. 10, l. 66-Col. 12, l. 2; Col. 12, ll. 42-57; Col. 17, l. 55-Col. 18, l. 10; Col. 18, ll. 43-50; Appendix III; Appendix VI; Figs 1A, 1B, 1C.</i></p>	<p>relating to selected items (<i>e.g.</i>, vendor name, product description, list price) (11:20-38; 11:62-66).</p>
<p>Means for building a requisition that uses data obtained from said database relating to selected matching items on said order list (‘172 Patent: claim 1)</p>	<p>Function: building a requisition that uses data obtained from a database relating to selected matching items on an order list.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a requisition module to execute an algorithm which includes the steps of: (1) transferring data relating to selected matching items included on an order list to a requisition program; and (2) building a requisition using data from the selected matching items on the order list to populate certain fields on the requisition form; and structural equivalents thereof.</p> <p><i>See, e.g., '172 Patent, Col. 1, ll. 15-40; Col. 10, ll. 22-44; Col. 12, l. 52- Col. 14, l. 14; Figs. 1-3; App. I, II, VI, VIII, IX.</i></p>	<p>Function: building a requisition that uses data obtained from said database relating to selected matching items on said order list</p> <p>Corresponding Structure: A software means initiated from requisition/purchasing system (40 or 240) running on local computer (20 or 220) that consists of the following steps:</p> <p>a. entering certain data (<i>e.g.</i>, account number, requisition number) in requisition/purchasing system (40 or 240) to create requisition tables stored in requisition database (42A) 6:44-65; 7:20-28);</p> <p>b. initiating search for matching items(s) in catalog database (36 or 236) from either requisition/purchasing system (40 or 240) or catalog search program (50 or 250) running on local computer (20 or 220) via two search means described above (8:15-32);</p> <p>c. displaying via catalog search program a hit list (47) of search results (9:39-45; 12:27-29; Appendix III)</p> <p>d. selecting one or more items to be requisitioned (10:21-24; 11:30-38);</p> <p>e. generating an order list (48) in shell (52 or 252) and catalog search program (50 or 250) containing data relating to selected items (<i>e.g.</i>,</p>

EXHIBIT 1
Comparison of Parties' Proposed Constructions

Claim Term	ePlus's Proposed Construction	Lawson's Proposed Construction
		<p>vendor name, product description, list price) (11:20-38; 11: 62-66);</p> <p>f. displaying data relating to selected items in order list (48) (11:38-43; 12:38-40; Appendix VI);</p> <p>g. transmitting data from order list (48) to requisition/purchasing system running on same local computer (20 or 220) via DDE protocol of interface (60) (11:50-54; 12:48-53; 13:1-21); and</p> <p>h. updating requisition tables in requisition database (42A) with data received from order list (48) via interface (60) (12:60-67).</p>
<p>Means for processing said requisition to generate purchase orders for said selected matching items (‘172 Patent: claim 1)</p>	<p>Function: processing a requisition to generate purchase orders for selected matching items.</p> <p>Exemplary corresponding structure, material and acts: a computer which is programmed with special-purpose software modules including a purchasing module to execute an algorithm which includes the steps of: (1) accepting the requisition; and (2) generating purchase orders based on the data included in the requisition related to the selected matching items on the order list and based on predetermined rules relating to the user's preference (e.g., one purchase order to each distinct supplier referenced in the requisition); and structural equivalents thereof.</p> <p><i>See, e.g., '172 Patent Col. 1, ll. 15-40; Col. 10, ll. 53-65; Col. 15, l. 39-Col. 16, l. 4; Col. 18, ll. 6-16; Col. 18, ll. 54-67; Figs. 1-3.</i></p>	<p>Function: processing a requisition to generate purchase orders for the selected matching items.</p> <p>Corresponding Structure: None.</p>